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Superior Court - Berkshire
Docket Number

COMMONWEALTH OF MASSACHUSETTS

BERKSHIRE, SS. SUPERIOR COURT
C. A. NO.:

ANN GROCHMAL, Plaintiff,	
v.	**COMPLAINT AND JURY DEMAND**
AMERICAN INSTITUTE FOR ECONOMIC RESEARCH;	
GREGORY M. van KIPNIS;	
JEFFREY TUCKER.	
Defendants.	

COMPLAINT

PARTIES

1. Plaintiff is an individual residing in Massachusetts and at all times relevant to this Complaint she worked at American Institute for Economic Research in Great Barrington, MA.

2. Defendant, American Institute for Economic Research, is a corporation with a principal place of business at 250 Division Street, Great Barrington, MA.

3. Defendant Gregory M. van Kipnis is an individual residing in Massachusetts and at all times relevant to this Complaint he was on the Board of American Institute for Economic Research in Great Barrington, MA.

4. Defendant Jeffrey Tucker is an individual residing in Texas and at all times relevant to this Complaint he worked at the American Institute for Economic Research and resided in Great Barrington, MA.

FACTS

5. Mrs. Grochmal is female.

6. Mrs. Grochmal began working for the American Institute of Economic Research, ("AIER"), a Libertarian Think Tank, in August 2019 as the Academic Program Administrator.

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7. She performed her job in a proficient manner throughout her employment.

8. One aspect of her job duties entailed overseeing the Internship, Visiting Fellow and Visiting Scholar Programs, which included managing travel, visitation, residential, and workplace community experiences for the interns, fellows and scholars during their stay at AIER. Additionally, Mrs. Grochmal coordinated logistics planning for on and off campus academic conferences, including the application process, travel and event activities.

9. AIER has a large campus, which consisted of a number of buildings, including an office, a library, an adjoining stone manor house, detached apartments and a gatehouse in Great Barrington, Massachusetts.

10. In a most unorthodox practice, AIER houses many of its employees, interns and affiliated professionals on the premises, which by AIER's design, causes their homelife and work life to be entwined.

11. AIER leadership designed and exploited this living arrangement so that they could require the staff, fellows, scholars and interns to attend mandatory socialization events in the manor, drink alcohol with them and be an audience so AIER leadership could hold court.

12. AIER leadership, including but not limited to former President Edward Stringham and former AIER Editorial Director Jeffrey Tucker, routinely organized bacchanalian drinking parties at the manor, bought (with AIER money) and supplied alcohol to AIER staff, affiliated professionals and often underage interns, and made sexual overtures toward and sexualized statements about women present, from the workplace and from the professional arena.

13. Most of AIER management attended some of these parties and witnessed first-hand these sexualized interactions with staff and interns, which were on public display on AIER premises and many of which Mrs. Grochmal witnessed.

14. Mrs. Grochmal heard AIER leadership pressuring female interns and staff to attend the after-work cocktail parties held at 4:30pm every day and movies being shown at AIER at night. If the female employees did not show up, leadership asked them why they were not there. Leadership sent messages to the female staff via the work messaging system "Slack" pressuring them to come. This same pressure was not applied to the male employees.

15. Female interns, fellows and scholars told Mrs. Grochmal that they were worried that if they did not show up and drink with AIER leadership, their positions might be prematurely terminated and/or they would not be hired for permanent positions.

16. AIER management and senior staff stood by and took no action while then AIER Editorial Director Jeffrey Tucker dressed female staff members, interns and other affiliated writers up in old fur coats purchased by Jeffrey Tucker and paid for by AIER. Later the pressure to wear and model pearl necklaces was also introduced by Jeffrey Tucker.

17. AIER leadership, including but not limited to Jeffrey Tucker and Edward Stringham, would insist that the women model the furs and then ogle the women and gape at them, asking the males and females in attendance, i.e., the females' co-workers and managers, "Isn't she beautiful?" and "Doesn't she look lovely dressed like this?".

18. On numerous occasions, Mrs. Grochmal heard Jeffrey Tucker pressuring women to wear fur coats. Mr. Tucker offered a fur coat to a visiting scholar and told her he wanted her to wear one. He told her he buys them for "women in the house".

19. Jeffrey Tucker routinely told the women in attendance at AIER happy hours and dinners how to sit and act, as if they were dolls he was positioning.

20. AIER management and its Board of Directors knew about this behavior and either engaged in it or took no action to stop it.

21. Starting circa December 2019/January-February 2020 and continuing throughout her employment at AIER, Mrs. Grochmal also complained multiple times to her boss, Brad Devos, about the sexual harassment and sexually hostile environment. He responded that Mrs. Grochmal should "not get involved". He stated that Jeffrey Tucker had done this at his previous jobs and that it was only a matter of time before Jeffrey was his own demise. Mr. Devos took no action.

22. In the spring of 2020, Mrs. Grochmal complained to the AIER Human Resources department about this behavior, including the expectation that employees and visitors drink with management after work, the blurring of lines between work and socialization, the inappropriate sexual discussions at work, and the abuse of power by management which resulted in Mrs. Grochmal and other females feeling threatened, intimidated and unsafe at work. Despite these complaints, no action was taken.

23. A research associate at AIER asked Mrs. Grochmal if she knew about a woman who had sued Jeffrey Tucker for sexual harassment and stated that he knew that Jeffrey Tucker had been terminated from previous positions for sexual misconduct before AIER hired him.

24. Mrs. Grochmal heard Jeffrey Tucker openly telling the interns, visiting fellows, scholars, conference attendees and staff members about his prior lawsuits for sexual harassment and called the women "tramps" and that they only wanted money.

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25. In May 2020, Jeffrey Tucker told Mrs. Grochmal that he had previously been sued for sexual harassment at AIER and the woman was a “slut” and a “gold digger”.

26. Circa November/December 2020/January 2021, a female employee told Mrs. Grochmal that she was washing dishes in the AIER Gatehouse when Jeffrey Tucker came up behind her and started massaging her. The intern told Human Resources who sent a Slack (internal messaging system) message stating that employees were not to give massages to each other. No other action was taken and AIER deleted the Slack message.

27. In early 2021, Mrs. Grochmal observed Jeffrey Tucker’s girlfriend, a member of staff, having a panic attack as a result of a lover’s spat with Mr. Tucker on AIER premises and Mrs. Grochmal was told that there were physical and verbal fights between upper management and their staff lovers occurring in public spaces of AIER buildings.

28. Mr. Tucker often intimidated employees who were not receptive to his sexual overtures.

29. On many occasions but more aggressively in early 2021 Jeffrey talked to the interns, fellows and employees about his sexual and romantic relationships with their co-workers, which made them uncomfortable.

30. Jeffrey also talked to the interns, fellows and employees about another member of senior management having a sexual relationship with an intern and Jeffrey Tucker called the intern a “tramp”.

31. On January 27, 2021, an intern reportedly abruptly left AIER and ceased working there after Jeffrey Tucker, while wearing only his boxer briefs, pulled the intern and another girl into his bedroom.

32. Circa January/February 2021, Mrs. Grochmal was present at the lunch table at AIER when Jeffrey Tucker talked openly to everyone at the table about how he had two girlfriends at work and couldn’t decide which one to date.

33. In February 2021, at the AIER lunch table, Jeffrey Tucker was publicly sexually groping a writer paid by AIER with whom he was involved.

34. On February 19, 2021, Jeffrey Tucker excitedly told Mrs. Grochmal a story about a young woman who was supposed to be doing a Skype interview with him but instead she began taking her clothes off. This made Mrs. Grochmal very uncomfortable.

35. When Mrs. Grochmal did not react favorably to this story, Jeffrey Tucker went to the next desk and told another female employee the same story.

36. Mrs. Grochmal was also pressured to wear the furs, being told before leaving for a business trip on February 24, 2021 by Jeffrey Tucker: "Wear this fur, you'll be beautiful, look at how she looks (indicating another woman in the group)." Mrs. Grochmal refused, and Jeffrey Tucker responded: "Well how about this stole?" In response, Mrs. Grochmal left the premises.

37. This sexually charged atmosphere was constant and omnipresent, pervasive throughout the Stonehouse, the offices, on campus and during off campus work trips and it made Mrs. Grochmal very uncomfortable and interfered with her participation in the workplace and her work.

38. Throughout Mrs. Grochmal's employment, AIER leadership made sexual comments at work in Mrs. Grochmal's presence and in front of other employees as well and spoke about their sexual conquests and women in a disparaging manner.

39. Many of the interns, visiting fellows, scholars and event participants were perplexed and frightened by this behavior and told Mrs. Grochmal as much and she reported it.

40. Both AIER leadership and the Board of Directors for AIER knew of the excessive drinking parties, the drunk driving in the community by AIER leadership and staff and the rampant sexually hostile environment at AIER.

41. An intern told Mrs. Grochmal that an AIER Board Member told her to be "careful" at AIER because Jeffrey Tucker could be "aggressive" and a "predator".

42. AIER's Board of Directors, including Chairman Gregory van Kipnis, knew of Jeffrey Tucker and Edward Stringham's sexually inappropriate behavior at work and allegations of sexual harassment against them at AIER and they took no action to remove either of them, thereby tacitly condoning their behavior.

43. Mrs. Grochmal heard Jeffrey Tucker repeatedly say: "We have no rules at AIER."

44. In March 2021, a staff member told Mrs. Grochmal that Jeffrey Tucker was kissing an employee of AIER subsidiary AIS in one of the main common rooms at AIER.

45. On March 3, 2021, as well as on numerous other occasions, Jeffrey Tucker pressured Mrs. Grochmal to compliment the women wearing the furs: "Tell her she looks beautiful."

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46. On March 11, 2021, at the lunch table at AIER, Jeffrey Tucker again told to Mrs. Grochmal and two interns, the story of the female who allegedly began removing her clothes while on a Skype interview with Mr. Tucker. This made Mrs. Grochmal very uncomfortable.

47. On March 16, 2021, the AIER Human Resources manager approached Mrs. Grochmal to ask about the intern who left AIER abruptly due to sexual harassment, referenced in para. 31 above. The Human Resources manager said that the intern left because she was being called "honey" and "sweetie" and that the manager believed that it was Jeffrey Tucker who perpetrated the sexual harassment and that she "wouldn't be surprised" because there had been another sexual harassment suit against Jeffrey Tucker.

48. Jeffrey Tucker's sexualization of the atmosphere at AIER and objectification of the women at AIER sent the message to other males at AIER that making sexual overtures at work was acceptable and encouraged. Jeffrey Tucker publicly pressured AIER employees to have romantic relationships at work, which made them uncomfortable.

49. Jeffrey Tucker pressured the interns, fellows and staff members to attend after work social events, including communal dinners and movies, and drink alcohol.

50. AIER allowed Jeffrey Tucker to perform the final Skype interviews for internship and fellow candidates, which he insisted on doing so he could ensure that the candidates fit into the AIER "house culture", which at that time consisted of drinking and a sexualized environment.

51. Mrs. Grochmal was told by interns that some were so afraid of AIER management that when alone in their room on AIER property, they would prop a chair up under the doorknob to securely lock the door because they knew there was an easily accessible master key and were afraid someone might use it to enter their room and make sexual advances.

52. At night, Jeffrey Tucker would routinely come up to the third floor of the Manor House, where the interns and young female employees slept, and knock on the door of his mistress, an AIER intern.

53. Mrs. Grochmal was told by several interns that Louis Eastman, who would later be promoted by AIER Chairman van Kipnis to Vice President of AIER, would often go upstairs to the third floor of the manor where the female interns lived under the guise of bringing them coffee. The interns were uncomfortable because they were often coming out of the shower and not fully dressed when he would enter the living space.

54. On April 1, 2021, an intern told Mrs. Grochmal that Jeffrey Tucker initiated a conversation with her about Dierdre McClosky's book *Crossing*, which details the

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author's journey crossing the gender line. Jeffrey Tucker stated that the book addressed how someone who changes gender cannot feel sexual pleasure and repeatedly talked about what it's like to feel sexual pleasure and asked the intern her thoughts, which made her uncomfortable.

55. Many interns told Mrs. Grochmal that there was significant and constant pressure by management to drink at AIER.

56. An intern told Mrs. Grochmal that a Senior Research Fellow asked her if she was ok being in the back seat of a car with AIER President Edward Stringham because he was known to be "handsy".

57. Jeffrey Tucker attended a Students for Liberty event in Connecticut and invited the undergraduate students to come back to AIER and drink for the evening. Ten to fifteen students came and were served alcohol then these students proceeded to drive back to Connecticut.

58. There were also discriminatory comments made at AIER regarding religion.

59. At AIER in April 2021, Mr. Tucker described a Catholic intern as a "self-righteous" Catholic convert who cannot hold his tongue and is "holier than thou and [Tucker] can't stand him and can't wait for him to leave."

60. Jeffrey Tucker came into Mrs. Grochmal's office the next day talking about "these overly zealous Catholics" and their strong beliefs making trouble for him. She told him she was Catholic, and he responded: "You know how overly zealous people who convert to Catholicism can be."

61. Mrs. Grochmal is religious and felt offended and concerned.

62. On April 19, 2021, because Mrs. Grochmal was not getting any results from Human Resources or management of AIER, she sent a 12-page letter to the AIER Board of Directors, including Defendant van Kipnis, detailing the discrimination and toxic environment.

63. On April 20, 2021, the Chairman of the AIER Board, Gregory van Kipnis, called Mrs. Grochmal to discuss the allegations in her April 19, 2021 letter and said he was particularly concerned about the religious discrimination and the underage drinking. He said he was also concerned about the other issues mentioned, i.e., the pervasive and explicit sexual harassment, but he was most concerned about the religious and underage drinking aspect because he felt that they were "legal issues".

64. Mr. van Kipnis then gave Mrs. Grochmal lip service about how disappointed he was in AIER management, including Human Resources and Mrs. Grochmal 's

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manager, Brad DeVos, for not responding to her prior complaints about the rampant discrimination and illegal activities at AIER.

65. However, Mr. van Kipnis then said: "You know, this is the 'Old Boys' Network', you wouldn't understand it." When Mrs. Grochmal brought up that the other males in power sat back and allowed it to happen, Mr. Van Kipnis said: "Well, they just want to be "cool" like Jeff and Ed."

66. Mrs. Grochmal told Mr. van Kipnis that she was concerned for the safety of both herself and the female employees at AIER and asked that her identity and the fact that she wrote the letter be kept confidential – to be used only by the AIER Board of Directors.

67. Mr. van Kipnis assured Mrs. Grochmal that he would keep her identity and the fact that she had sent the letter to him private, however Brad DeVos told Mrs. Grochmal that Gregory van Kipnis called him soon after and told him that Mrs. Grochmal had written a 12-page letter to the Board complaining about the drinking and sexualized environment at AIER.

68. Furthermore, this information was also made available to Mrs. Grochmal's co-workers. Mrs. Grochmal soon heard gossip around the office about how she had sent the Board the "12-page letter" complaining about the alcohol fueled sexualized work environment at AIER.

69. Then, on April 26, 2021, Gregory van Kipnis copied Mrs. Grochmal's personal email address on an email to the Board, senior management, and two facilities workers regarding the removal of all alcohol from campus. Based on her level within the organization, Mrs. Grochmal should clearly not have been copied on that email and Mr. van Kipnis's inclusion of her exposed her as the person who complained to the Board.

70. After Gregory van Kipnis published the fact that Mrs. Grochmal had complained of discrimination, she was retaliated against. Mrs. Grochmal was ostracized at work by AIER management and some of her co-workers. Many employees would no longer speak to Mrs. Grochmal at work. This also interfered with Mrs. Grochmal's ability to perform her job, as some employees traveling to campus who were aligned with AIER management would not notify her that they were coming and hence she could not arrange for their on-campus accommodations, which was a part of her job, which compromised her ability to perform some of her duties at AIER.

71. AIER requested that Mrs. Grochmal meet with its attorney to talk about her allegations.

72. On April 26, 2021, Mrs. Grochmal met with AIER's attorney and told the attorney that Jeffrey Tucker, Edward Stringham and other members of

management served alcohol to an underage intern on work premises and reportedly engaged in sexually suggestive interactions with interns and visiting fellows. Mrs. Grochmal also reiterated that she had repeatedly complained to management about the discrimination and hostile work environment repeatedly for months and he took no action.

73. Upon information and belief, AIER offered Jeffrey Tucker the opportunity to resign in lieu of termination and he resigned in April 2021. However, AIER permitted Mr. Tucker to continue to live on the premises for a week. Only after multiple employees raised numerous concerns to AIER that Mr. Tucker was still living on the campus with the employees did AIER finally remove him.

74. During a staff meeting held the Monday following Jeffrey Tucker's resignation, in further retaliation against Mrs. Grochmal, then President of AIER Edward Stringham announced at the meeting that "someone" had resigned and then proceeded to turn in his chair and stare at Mrs. Grochmal, who was sitting across the room to his left. He continued to stare at her as he spoke in glowing terms about the contributions Jeffrey Tucker had made to the organization, but never once used his name. Mrs. Grochmal felt extremely uncomfortable by Mr. Stringham's blatant and very public actions, and several other employees commented to Mrs. Grochmal about it. This made Mrs. Grochmal very uncomfortable.

75. Circa May 20, 2021, former AIER President Edward Stringham was terminated.

76. Mr. van Kipnis admitted during a staff meeting following Mr. Stringham's termination that AIER did not do proper due diligence on either Edward Stringham or Jeffrey Tucker before hiring them.

77. Despite Mrs. Grochmal telling Mr. van Kipnis and the AIER lawyer that she had complained to her supervisor, Brad DeVos, and that he took no action in response to her complaints of discrimination and hostile work environment, AIER and its Board of Directors promoted Brad DeVos to President of AIER.

78. Louis Eastman was promoted to Vice President.

79. AIER gave the semblance of banning alcohol in response to Mrs. Grochmal's letter, however Brad DeVos, now President of AIER, told Mrs. Grochmal that it was his priority to get alcohol allowed back on the AIER campus.

80. On or about May 21, 2021, a drinking party was arranged on a neighbor's land and publicized on the AIER "Slack" channel. AIER Vice President Lou Eastman liked the post. Mrs. Grochmal complained to Brad DeVos and the post was removed. Public complaints and plans for how to get alcohol back on campus continued in daily office discussions and on Slack messages.

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81. The men to whom Mrs. Grochmal complained and who did nothing, were promoted to the head of AIER leadership.

82. The females to whom Mrs. Grochmal complained were allowed to remain in AIER leadership.

83. The Chairman of the AIER Board, when informed of gross and flagrant sexual harassment and deviance at AIER, responded that it was a "Boys Club" and Mrs. Grochmal "wouldn't understand".

84. As a result, no other avenues for complaints of the discrimination and hostile work environment remained.

85. AIER, on its official social media account, repeatedly continued to publicly endorse Jeffrey Tucker and Edward Stringham subsequent to their separation from AIER .

86. Newly promoted AIER managers, including Lou Eastman, publicly endorsed Jeffrey Tucker and Edward Stringham at work and on social media, which signaled to the AIER employees that nothing had changed.

87. AIER Vice President Eastman made statements at AIER that he missed the "Good Old Days" of Mr. Tucker and Mr. Stringham and said: "Don't worry, Jeff Tucker and Ed Stringham will be back."

88. This all sent a clear message that AIER sided with the perpetrators of sexual harassment and discrimination and not the victims.

89. The sexual harassment, sexually hostile work environment, pressure to comply and join in with sexually charged alcohol-soaked culture at AIER pervaded for the duration of Mrs. Grochmal's employment; it was an ongoing, pervasive pattern of sexual harassment and a hostile work environment.

90. Throughout her employment, Mrs. Grochmal made repeated complaints to numerous members of management of AIER and AIER's board in the hope that the environment would improve. When it became clear that nothing would change, Mrs. Grochmal made the determination that AIER's continued pattern of condoning and ratifying the sexually hostile work environment made the working conditions so intolerable that she could no longer work at AIER, and she was forced to resign. On October 2, 2021, Mrs. Grochmal was constructively discharged.

91. As a result of the discrimination, hostile work environment and retaliation perpetrated by Defendants, Mrs. Grochmal suffered from severe emotional distress in the form of stress, tension, depression, anxiety and sleeplessness.

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COUNT I: GENDER DISCRIMINATION IN VIOLATION OF M.G.L. C. 151B (Defendants)

92. Plaintiff restates and re-alleges all preceding allegations as if fully recited herein.

93. Massachusetts prohibits discrimination on the basis of gender in the workplace. G.L. c. 151B, § 4(1).

94. Defendants discriminated against Plaintiff and other employees based on gender for the entirety of Plaintiff's employment.

95. Plaintiff seeks damages as a result of the age discrimination perpetrated by Defendants.

COUNT II: SEXUAL HARASSMENT IN VIOLATION OF M.G.L. C. 151B (Defendants)

96. Plaintiff restates and re-alleges all preceding allegations as if fully recited herein.

97. Massachusetts prohibits sexual harassment in the workplace. G.L. c. 151B, § 4(1).

98. Defendants sexually harassed Plaintiff and created a sexually harassing and hostile work environment for the entirety of her employment.

99. Plaintiff seeks damages as a result of the race and/or national origin discrimination perpetrated by Defendants.

COUNT III: HOSTILE WORK ENVIRONMENT IN VIOLATION OF M.G.L. C. 151B (Defendants)

100. Plaintiff restates and re-alleges all preceding allegations as if fully recited herein.

101. A plaintiff establishes that hostile work environment is present when a plaintiff shows that the workplace was pervaded by harassment or abuse, with the resulting intimidation, humiliation, and stigmatization, and posed a formidable barrier to the full participation of an individual in the workplace. Cuddyer v. Stop & Shop Supermarket Co., 434 Mass. 521, 532 (2001), *quoting* College-Town, Div. of Interco, Inc. v. Massachusetts Commn. Against Discrimination, 400 Mass. 156, 162 (1987); Prescott v. Higgins, 538 F.3d 32 (1st Cir. 2008). A work environment pervaded by harassment or abuse, with the resulting intimidation, humiliation, and stigmatization, poses a formidable barrier to the full participation of an individual in the workplace. Id.

102. Hostile work environment may be manifested by a series of harassing acts that may be described as pinpricks that only slowly add up to a wound; one

pinprick may not be actionable in itself, and its abusive nature may not be apparent except in retrospect, until the pain becomes intolerable. Clifton v. Massachusetts Bay Transp. Authority, 445 Mass. 611(2005). By its nature, "hostile work environment" often means that there are series of events which mount over time to create such a poisonous atmosphere as to violate the law and as a result, the question as to when offensive conduct does in fact become unlawful is often better resolved by the factfinder at trial, and not on summary judgment. Andujar v. Nortel Networks, Inc., 400 F.Supp.2d 306 (D.Mass.2005).

103. In this case, defendants created a work environment pervaded by harassment and abuse which continued for the duration of Plaintiff's employment . The continued harassment and management's toleration of the situation created a formidable barrier to Plaintiff's full participation in the workplace.

104. Plaintiff seeks damages as a result of the hostile work environment perpetrated by Defendants.

COUNT IV: RETALIATION IN VIOLATION OF M.G.L. C. 151B (Defendants)

105. Plaintiff restates and re-alleges all preceding allegations as if fully recited herein.

106. Retaliation is present when a plaintiff shows that she engaged in protected conduct, she suffered an adverse action, and a causal connection existed between the conduct and the adverse action. Mole v. University of Massachusetts, 442 Mass. 582, 591 (2004).

107. In this case, Defendants retaliated against Plaintiff after she reported the discrimination and harassment and defended others' rights to be free from discrimination.

108. Plaintiff seeks damages as a result of the retaliation perpetrated by Defendants.

WHEREFORE, the plaintiff respectfully request that this Court grant the following relief:

Enter Judgment against Defendants;

1. Award plaintiff attorney fees, costs and expert witness fees;
2. Award compensatory damages for lost wages and benefits, emotional pain and suffering, emotional distress, humiliation, anxiety, embarrassment, reputational damages, loss of enjoyment of life and out-off-pocket expenses or other financial losses, plus lawful interest;
3. Award punitive damages pursuant to G.L. c. 151B §9;

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4. Award multiple damages pursuant to G.L. c. 151B §9;
5. Order the defendants to pay prejudgment interest from the date of the filing of this complaint with the EEOC/MCAD and post judgment after entry of judgment; and

   Award such other relief as the Court deems fair and just.

JURY CLAIM

The plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,
ANN GROCHMAL,
By her attorney,

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Dated: December 29, 2022